REMARKS

Claims 66-86 are pending in the application. By this paper, new claims 85 and 86 are submitted, along with previously pending claims 66-84. No new matter is added by this amendment, which is clearly supported throughout the application, including FIG. 10 and the text associated therewith.

In the Advisory Action mailed November 7, 2006, it is stated that Claim 66 recites a "new information provider" and not "an information provider. Examiner maintains that applicant is attempting to improperly amend the claim(s)." However, claims 66-84 were submitted on July 13, 2005 and were entered at that time. No objection to the amendment or the claims was raised at that time. The same claims were pending on November 21, 2005 and no objection was raised to the claims. The same claims were pending on April 24, 2006 and no objection was raised to the claims. No clear reason has been provided as to why the claims were "improperly amended." In fact, the Applicants have not sought to amend independent claims 66 and 79 so it is not clear what amendments are even referred to in the Advisory Action.

In the final office action dated July 10, 2006, the rejection under 35 U.S.C. § 103(a) of claims 66-71 and 73-84 as being unpatentable over U.S. patent number 6,421,675 to Ryan, et al. ("Ryan") in view of U.S. patent number 6,289,341 to Barney ("Barney") was maintained. Further, the rejection under 35 U.S.C. § 103(a) of claims 67, 72-74 and 80-82 as being unpatentable over Ryan and Barney and further in view of U.S. patent no. 6,078,916 to Culliss ("Culliss") was also maintained. Reconsideration and allowance of claims 66-84 are respectfully requested.

Ryan actually relates to a database search system which provides keyword suggestions to a user of the search system, rather than to an information provider or an advertiser. Ryan column 5, line 13 explains that, in the system of Ryan, a keyword is "the word or phrase that *the user* enters to find a list of web pages" (*emphasis added*). The search process is described at Ryan column 4, lines 30-40. The Ryan system suggests keywords to the user based on a keyword that the user entered. Col. 7, lines 63-66; col. 8, lines 28-32.

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Since the keywords are suggested to the user, Ryan cannot disclose the present invention of claims 66-84 which relates to suggesting keywords to an information provider. Information providers are present in the system disclosed by Ryan, e.g., FIG. 1B "Developer site/computer" 104A, B; column 4, lines 3-11. However, Ryan's keyword suggestion feature serves the user who submits search requests, not the developer who provides content and other information. Ryan does not even recognize the problem solved by the presently claimed invention, that an information provider might want or need some suggestion of keywords to bid upon.

New claims 85 and 86 relate to a "method for making search term recommendations to an advertiser in a pay for placement market system in which search listings of advertisers may be searched by users entering search terms." For the reasons indicated above, Ryan fails to disclose recommending search terms to an advertiser. Further, the relation is specified in claim 85 between users, who enter search terms to search the search listings, and advertisers in the pay for placement market system. Accordingly, claims 85 and 86 are submitted to be allowable over the cited art.

With this response, the application is believed to be in condition for allowance. Should the examiner deem a telephone conference to be of assistance in advancing the application to allowance, the examiner is invited to call the undersigned attorney at the telephone number below.

Respectfully submitted,

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December 11, 2006 BRINKS HOFER GILSON & LIONE P.O. BOX 10395 CHICAGO, ILLINOIS 60610 (312) 321-4200